

The SARA PBA Working Group made numerous findings. Below is my response to each relative to NASA's implementation of PBA:

### **#1. Despite OMB Target, Agencies Remain Unsure When to Use PBSA**

That finding is not true for NASA. At NASA PBA is applied to the extent practicable. That is, the drafter of the SOW or SOO for all acquisition of services must consider and apply PBA. Ultimately, a particular acquisition may be substantially PBA or not depending on the nature of the acquisition. However, the discipline of always considering performance contributes to the strengthening of the corporate culture.

### **#2 PBSA Solicitations & Contracts Continue to Focus on Activities and Processes, Rather than Performance and Results**

There are many situations wherein processes must be specified, especially where hazardous materials, safety, and health issues come into play. Most of NASA's acquisitions of services have both quantitative performance standards and specified processes.

### **#3 PBSA's Potential for Generating Transformational Solutions To Agency Challenges Remains Largely Untapped**

That finding is not true for NASA. We have applied PBA throughout our Agency, even contracting out launch preparation of the shuttle.

### **#4. Within Federal Acquisition Functions, There Still Exists a Cultural Emphasis on "Getting to Award"**

True. Agency budgets are appropriated with time limits for their obligation to contracts. Budget execution is a coordinated event that requires the close coordination of (at a minimum) the technical, financial, and procurement communities. An untimely award threatens the Agency budget and therefore its mission.

## **#5. Post-Award Contract Performance Monitoring and Management Needs to Be Improved**

Agree. DAWIA broke the ground in this area. All members of the acquisition work force must understand their role and must be properly trained to perform their role.

## **#6. Most Contract Incentives Are Still Not Aligned to Maximize Performance and Continuous Improvement**

That finding is not true for NASA. Our award fees are developed in accordance with the NASA Award Fee Contracting Guide

<http://www.hq.nasa.gov/office/procurement/regs/afguide.html>.

## **#7. FPDS Data Are Insufficient and Perhaps Misleading Regarding Use and Success of PBSA**

True. FPDS-NG limitations cause NASA's PBSA performance to be understated.

## **Recommendation 1: OMB's Government-Wide Quota of Requiring 40% of Acquisitions be**



**Performance-based Should be  
Adjusted to Reflect Individual  
Agency Assessments and Plans for  
Using PBA**



- PBA targets to be set by each agency, with review by OMB

Agree.

## **Recommendation 2: OFPP Should Issue More Explicit Guidance and Create a PBA**



**“Opportunity Assessment” Tool to  
Help Agencies Identify When They  
Should Consider Using  
Performance-based Acquisition**

Inasmuch as NASA already calls for the implementation of PBA to the maximum extent practicable, the use of a tool would likely only dilute NASA’s PBA implementation.

## **Two Categories of PBAs**

This would not be useful to NASA, which implements PBA on a continuum. The dichotomy proposed would undermine the continuum.

## **Recommendation 3: Require Agencies to Devise “Acquisition Performance Plans” to Guide their Acquisition Management**

NASA already requires PBA to be addressed in the Acquisition Planning. A requirement for yet another plan would be burdensome and not helpful.

**Recommendation 4:**  
**Publish a Best Practice Guide on**  
**Development of Measurable**  
**Performance Standards for**  
**Contracts**



- Measurement "Chain" or "Logic Model" Performance measures should be defined using a structured framework

Agree. However, the guide should be kept simple and populated mainly with examples not chains or models.

**Recommendation 5:**  
**Modify the FAR to Require**  
**Identification of the Government's**  
**Need/Requirements by Defining**  
**"Baseline Performance Case" in**  
**Measurable Terms Up Front**

Disagree. OMB Circular A-11, the Capital Programming Guide already drives agencies to submit their budgets based on performance and results.

**Recommendation 7:**  
**OFPP Should Provide**  
**Improved Guidance on**  
**Types of Incentives**  
**Appropriate for Various**  
**Contract Vehicles**

Disagree. The discussion in FAR Part 16 is sufficient.

**Recommendation 8:**  
**OFPP Should Revise the**  
**Seven Step Process to**  
**Reflect the Panel's new**  
**PBA Recommendations**

Disagree. The panel's recommendations should be vetted by the Agencies before OFPP implants them in a guide.